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April 6, 2020

Via ECF With A Courtesy Copy Via E-Mail.

Honorable Katherine Polk Failla, U.S.D.J
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

***Re: Pine Management, Inc. v. Certain Underwriters at Lloyd's London, et al.
Civil Action No. 20-cv-02491-KFP***

Dear Judge Failla:

This firm represents Certain Underwriters at Lloyd's, London and Certain London Market Companies Subscribing to Certificate No. MPL 1690585.16 (collectively, the "Defendants") in the above-referenced matter. Pursuant to Your Honor's Individual Motion Practice and Rules, the Defendants hereby request an adjournment of the pre-trial conference presently scheduled for June 24, 2020 to another day that is convenient for the Court, with the exceptions of June 9, 18, 23-25, and July 8, 16, and 17, 2020, as more fully explained below.

On April 1, 2020, this Court scheduled an initial pre-trial conference for June 24, 2020 at 2:30 p.m. in Courtroom 618 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York. *See* Docket Entry No. 13. There has been no previous request for an adjournment of the initial pre-trial conference. Additionally, this Court has not entered a Scheduling Order, and therefore, no other scheduled dates will be affected if the Court were to grant the Defendants' request for an adjournment.

As reason for the current request for adjournment, the undersigned represents that she will be traveling out of state from June 23 through June 25, 2020 for another matter, which cannot be rescheduled. Undersigned counsel further represents that she has other conflicts that preclude her from appearing before this Court on June 9 and 18, and July 8, 16, and 17, 2020, which cannot be rescheduled. Pursuant to Your Honor's Individual Motion Practice and Rules, the undersigned will be principal trial counsel, and therefore, is required to appear at all conferences with the Court.

The Defendants have discussed the requested adjournment with counsel for the Plaintiff. Plaintiff's counsel have represented that they consent to the Defendants' request for an adjournment of the June 24, 2020 initial pre-trial conference.

Accordingly, the Defendants respectfully request that this Court adjourn the pre-trial conference presently scheduled for June 24, 2020 to another day that is convenient for the Court, with the exceptions of June 9, 18, 23-25, and July 8, 16, and 17, 2020.

Thank you for Your Honor's Consideration.

Sincerely,



Scarlett M. Rajbanshi

cc: Jane A. Horne, Esq.
Dennis Nolan, Esq.
John Leonard, Esq.

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Application GRANTED. The initial pretrial conference previously scheduled for June 24, 2020, is hereby ADJOURNED to **June 22, 2020, at 4:30 p.m.** in Courtroom 618 of the Thurgood Marshall Courthouse, 40 Foley Square, New York.

Dated: April 6, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE